



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

March 6, 2024

**By ECF and Email**

The Honorable Gregory H. Woods  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: **United States v. Andrey Kostin, et al., S2 24 Cr. 91 (GHW)**

Dear Judge Woods:

With the consent of defense counsel, the Government writes to respectfully request the exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161, from tomorrow, March 7, 2024, until the March 19, 2024, the date of the initial pretrial conference, to allow the court to hold a pre-trial conference, allow the Government time to produce discovery and defendants time to review that discovery, to allow the parties to discuss a potential pre-trial resolution, and because the ends of justice served by such an exclusion outweigh the interests of the public and the defendant in a speedy trial. Time was initially excluded until March 7, 2024, when that was set as a control date for the initial pretrial conference. As the Court is aware, the initial pretrial conference was ultimately scheduled for March 19, 2024, and the Government therefore requests that time be excluded until that date. We have conferred with defense counsel for defendants Vadim Wolfson and Gannon Bond, who both consent to this request.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By:                     /s/                      
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